

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ZACKARY ELLIS SANDERS,

Defendant.

Case No. 1:20-cr-00143

Honorable T.S. Ellis, III

Trial: October 19, 2021

**ZACKARY SANDERS'S RULE 16(b)(1)(C) NOTICE**  
**REGARDING DR. TYLER WHITNEY**

Zackary Ellis Sanders, by and through counsel, notices his intent under Federal Rule of Criminal Procedure 16(b)(1)(C) to introduce expert testimony in the trial to commence on October 19, 2021.

Mr. Sanders may call as a witness at trial Dr. Tyler Whitney, licensed clinical psychologist. If called, Dr. Whitney will testify as an expert witness about his evaluation of Mr. Sanders and his findings as set forth in his final evaluation report, which explains his opinions regarding his evaluation of Mr. Sanders and the bases and reasons for those opinions. Given the nature of the information discussed by Dr. Whitney, that report was filed under seal. Dkt. 414. A copy of Dr. Whitney's *curriculum vitae*, which outlines his qualification as an expert witness, has likewise been provided to the government and the Court. Dkt. 282-1.

Respectfully submitted,

/s/

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 5<sup>th</sup> day of October 2021, the foregoing was served electronically on the counsel of record through the US District Court for the Eastern District of Virginia Electronic Document Filing System (ECF) and the document is available on the ECF system.

/s/ Jonathan Jeffress  
Jonathan Jeffress